

JASON M. FRIERSON, NVSBN 7709
United States Attorney
District of Nevada

DAVID PRIDDY, ILSBN 6313767
Special Assistant United States Attorney
Social Security Administration
Office of the General Counsel, Office 7
6401 Security Boulevard
Baltimore, MD 21235
Telephone: (510) 970-4801
Facsimile: (415) 744-0134
E-Mail: David.Priddy@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TOD ARMSTRONG

Plaintiff,

v.

MARTIN O'MALLEY,
Commissioner of Social Security,

Defendant.

Case No.: 2:24-cv-00049-DJA

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant, Martin O'Malley, Commissioner of Social Security (Defendant), respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Brief (Dkt. No. 17, filed on May 31, 2024), currently due on July 1, 2024, by 30 days, through and including July 31, 2024. Defendant further requests that the deadline for Plaintiff's optional reply brief be extended to August 14, 2024.

This is Defendant's first request for an extension of time to file a response. Good cause exists for this extension. Counsel is currently in the process of determining whether a settlement agreement is possible in this case and needs additional time to consider this option. If the case cannot be settled,

1 then Defendant's counsel will proceed with filing Defendant's response to Plaintiff's Brief by the new
2 due date of July 31, 2024. Counsel for Defendant advised counsel for Plaintiff of the need for this
3 extension on June 26, 2024. Counsel for Plaintiff confirmed that Plaintiff does not object to this
4 request.

5 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's
6 Brief, through and including July 31, 2024. This request is made in good faith and with no intention to
7 unduly delay the proceedings.

8
9 Dated: June 27, 2024

Respectfully submitted,

10 JASON M. FRIERSON
United States Attorney

11 /s/ David Priddy
12 DAVID PRIDDY
13 Special Assistant United States Attorney

14
15
16 IT IS SO ORDERED:

17 
18 _____
UNITED STATES MAGISTRATE JUDGE

19 DATED: 6/28/2024
20 _____
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, Maryland 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Marc Kalagian
Law Offices of Lawrence D. Rohlfing, Inc., CPC
12631 East Imperial Highway, Suite C115
Santa Fe Springs, CA
562-273-3702
Fax: 562-868-5491
Email: marc.kalagian@rksslaw.com

Leonard Stone
Shook and Stone, Chtd.
710 South 4th Street
Las Vegas, NV 89101
702-385-2220
Fax: 702-384-0394
Email: MRobles@shookandstone.com

Attorney for Plaintiff

Dated: June 27, 2024

/s/ David Priddy
DAVID PRIDDY
Special Assistant United States Attorney